

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
WESTERN DIVISION**

**FILED**

**FEB 20 2008**

**MICHAEL W. DOBBS  
CLERK OF DISTRICT COURT**

**RONNIE MANNS**  
Plaintiff

vs

Case No: 07 C 50244

**ILLINOIS DEPARTMENT OF  
CHILDREN AND FAMILY  
SERVICES  
LUTHERAN SOCIAL SERVICES**  
Defendants

**PLAINTIFF'S REQUEST FOR DENIAL OF STATE DEFENDANT'S MOTION TO DISMISS**

NOW COMES the Plaintiff, Ronnie Manns and moves that the State Defendant's Motion to Dismiss be denied. In support of this motion Plaintiff states as follows:

State defendant states that the Plaintiff's actions are completely barred by the Eleventh Amendment and must be dismissed. Plaintiff contends that the Eleventh Amendment does not supercede any alledged violation of the Fourteenth Amendment.

State Defendant states that "the essence of Plaintiff's complaint is his dissatisfaction with the conduct and outcome of state court proceedings and administrative process of the Department. To the extent that plaintiff is attempting to litigate matters previously considered by the state court,

the doctrine of issues preclusion and the Rooker-Feldman doctrine bar Plaintiff's claims." is false.

WHEREFORE, for the foregoing reason, Plaintiff respectfully request that this Honorable Court grant it's motion to deny State Defendant's motion to dismiss.

Resepctfully submitted

  
RONNIE MANNS  
Pro Se

## CERTIFICATION OF SERVICE

I hereby certify that on February 18, 2008 I have sent by U.S. Mail, postage prepaid, the document to the following participants:

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